

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 17-CR-10346-DPW

YASUNA MURAKAMI,

Defendant.

DEFENDANT'S PROPOSED CONDITIONS OF SUPERVISED RELEASE

Pursuant to the Court's Order of May 13, 2020, Defendant Yasuna Murakami ("Mr. Murakami") hereby submits proposed conditions of supervision that are relevant to the sentencing factors listed at 18 U.S.C. § 3553(a), involve only such deprivations of liberty or property as are reasonably necessary for the relevant sentencing purposes listed at 18 U.S.C. § 3553(a), and are consistent with the pertinent policy statements issued by the United States Sentencing Commission.

Mr. Murakami proposes that his sentence of incarceration be modified to time served, and that the Bureau of Prisons be ordered to release him immediately without holding for a 14-day quarantine period at MDC Brooklyn. Mr. Murakami will voluntarily self-quarantine for 14 days after his release from the custody of the Bureau of Prisons. Mr. Murakami proposes to live on his parents' property in New Hampshire. Mr. Murakami's family will secure any firearms on the property, and store the key in a safe deposit box for the duration of Mr. Murakami's home confinement on the property. Mr. Murakami proposes that his previously-imposed three-year term of supervised release commence immediately upon his release from the custody of the Bureau of Prisons. He further proposes the following conditions of release:

1. Mr. Murakami shall serve three years of supervised release restricted to a residence approved by U.S. Probation at all times except for medical necessities and court appearances or other activities specifically approved in advance by U.S. Probation.¹

2. Mr. Murakami shall be subject to location monitoring for the term of his home confinement as U.S. Probation deems necessary.

3. Mr. Murakami shall comply with all mandatory and standard conditions of supervision, as well as those additional supervised release terms ordered by the Court in its Judgment of May 3, 2018 (ECF No. 45).

4. Mr. Murakami shall not use alcohol to excess and shall not use or possess any narcotic controlled substance except by prescription from a licensed medical practitioner.

Dated: May 13, 2020

Respectfully submitted,

YASUNA MURAKAMI

By his attorney,

/s/ Seth B. Orkand

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¹ Defense counsel understands that U.S. Probation may recommend a different term of home confinement than that proposed here. Mr. Murakami does not object to any shorter term proposed by U.S. Probation.

CERTIFICATE OF SERVICE

I hereby certify that I served a true and accurate copy of the foregoing by ECF upon all counsel of record on May 13, 2020.

/s/ *Seth B. Orkand*

Seth B. Orkand